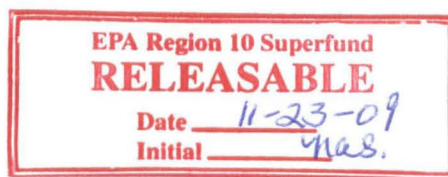


Brix Maritime Company Response to EPA's 104(e) Information Request

Entire response Releasable



Supplemental Table 22-1 – Reported Spills/Releases  
9030 NW St. Helens Road, Portland, Oregon

Date	Data Source	Product Type	Estimated Product Quantity	How Release Occurred	How Release Addressed
5-Oct-90	BMC	Fuel	100-150 gallons	Tug PJ Brix at Brix Dock – Approximately 1,000 gallons of fuel accidentally pumped into city's sewer system when sewer line was mistakenly hooked up to fuel system. 100-150 gallons spilled into the river.	Not noted.
10-May-92	BMC/NRC	Diesel	50 gallons, 50' x 60' rainbow sheen	Tug Lewiston – Blow hole/unknown cause. Approximately 30 gallons of diesel spilled during fueling of the tug at Brix Maritime's slip.	Boomed material, using sorbent pads.
22-Jul-92	BMC/NRC	Diesel	1 gallon	Tug Chief – Approximately 1 gallon of diesel accidentally pumped into river at Brix Maritime's slip when bilge compartment flooded.	Not noted.
19-Feb-93	NRC	Waste oil	1.5 gallons	Tug Cascade – Drip bucket beneath hose blown over by the wind. 5 gallons released of which 1.5 gallons released into the river.	Sorbents deployed.
21-Apr-93	NRC	Diesel	<1 gallon, 20' x 30' sheen	Changing out fuel line on dock and a small amount of product was spilled into the water.	Booms deployed and sorbent pads used.
23-Sept-93	NRC/PHWP	Waste oil	1 gallon	Tug T. J. Brix – Equipment failure, hose leaked while off-loading waste.	Recovered materials with pads.
30-Dec-93	NRC	Sheen	Unknown	Tug Lewiston – Sheen observed around the tug in the location of the Shop Barge.	Not noted.
20-Jan-94	NRC	Diesel	Unknown	Tug Clarkston – Soft patch failure.	Booms deployed, all material contained.
9-Mar-95	NRC/PHWP	Hydraulic oil	<1 gallon	Mechanical failure, power steering hose broke on vehicle causing materials to release.	Spill contained and absorbed.
24-Jan-96	NRC/PHWP	Waste oil	0.5 gallons	Shop barge – Bilge pump/hose came off, residual oil dripped out	Secured release, applied absorbents, deployed boom
28-Mar-96	SPA	Diesel	Unknown	Diesel fuel spilled onto work deck and refueling dock.	Not noted.
23-Apr-96	NRC	Cable lube grease	(2) 5-gallon drums	Two 5-gallon drums were thrown into a dumpster, rain washed material residue from the drums into the water.	Buckets removed from dumpster, material contained, sorbents deployed.
19-Jun-96	SPA	Sheen	30 yards by 1 mile	<i>Source of spill unknown.</i>	U.S. Coast Guard determined sheen non-recoverable.
15-May-97	NRC/SPA	Lube oil	Sheen	Drips from lube oil transfer line valve soaked into soil and caused sheen as the tide rose at the FMC-CSR fuel facility.	Not noted.

**Supplemental Table 22-1 – Reported Spills/Releases**  
**9030 NW St. Helens Road, Portland, Oregon**

**Sheet 2**

Date	Data Source	Product Type	Estimated Product Quantity	How Release Occurred	How Release Addressed
22-Sep-97	PHWP/SPA	Silver sheen	100 yards x 100 feet area	In river adjacent to facility dock, cause not noted. <i>Source of spill unknown.</i>	Not noted.
7-Oct-97	PHMP/SPA/NRC	Sheen	300-400' long x 150' wide	Wide sheen near dock. <i>Source of spill unknown.</i>	Not noted.
14-Oct-97	NRC	Sheen	Unknown	Tug Jim Moore – Sheen appeared around tug. Willamette River, Mile 5.5.	Boomed sheen.
12-Jan-98	BRIX/NRC/PHWP	Diesel	1 – 5 gallons	Work (Shop) Barge (BMC-13) at Foss mooring – Mechanical failure, oil/water separator disconnected, causing a small sheen.	Release secured, deployed booms and absorbent pads to recover sheen, contractor hired.
12-Jan-98	NRC/PHWP/SPA	Diesel	5 gallons/25 gallons	Work Barge (BMC-13) at Foss mooring – Oil/water separator line broke due to subfreezing conditions. Willamette River, Mile 6.	Separator shut off and line repaired, response contractor mobilized to scene.
30-Sep-98	BRIX/NRC/SPA	Oil sheen	75 yards x 10 yards	Sheen observed in water. <i>Source of spill unknown.</i>	Spill contained with booms, responder mobilized. USCG determined sheen was unrecoverable (SPA).
23-Dec-98	BRIX/NRC/SPA	Waste oil/ bilge slops	5 gallons	Bilge water transfer hose from work barge to shore storage line ruptured when valve froze causing discharge to Willamette River at Foss mooring.	Contained with booms, spill responder mobilized to site.
23-Jan-99	BRIX/NRC/PHWP/SPA	Oil sheen	Unknown	Tug Sarah Brix at Foss mooring– Tug had been idle for long period, small sheen after start up, release likely due to leak from alley stuffing box.	Sheen stopped following initial startup and contained. Used absorbent pads.
07-Feb-00	BRIX/NRC	Diesel	2 – 5 gallons	Tug Lewiston at Foss Linnton fuel dock – Burp from sounding tube, cause unknown.	Booms applied, absorbents applied, material contained, recovered most of the fuel in the water.
24/29-May-00	BRIX/NRC	Bilge water	Unknown	Tug Joseph T at Foss docks – Bilge discharged because pump was not turned off.	Bilge pump turned off. Spill boomed and contained. Spill response contractor mobilized to site.

Supplemental Table 22-1 – Reported Spills/Releases  
9030 NW St. Helens Road, Portland, Oregon

Date	Data Source	Product Type	Estimated Product Quantity	How Release Occurred	How Release Addressed
8-Jul-02	BRIX/NRC/PHWP	Diesel	5 gallons	Tug Lewiston at Foss dock – Fuel overfill during refueling, releasing material into the water.	Booms and sorbent pads deployed prior to fueling and release and contained/ recovered material. Amended fuel transfer procedures to state “insure [sic] all sight glass valves are in full open position ...”
21-Apr-03	BRIX/NRC	Oily bilge water	<2 gallons No.2-D /diesel/ hydraulic oil	Tug Joseph T at Foss moorings – Oily bilge water/diesel/hydraulic oil automatically pumped overboard due to mechanical failure.	Expanded bilge water containment system.
9-Sep-04	BRIX/NRC	Lube oil	2 gallons	Foss dock – Lube oil released to water due to overfilling (wrong) tank on vessel; personnel error. Mile 5.1.	Containment booms and absorbent pads deployed. Captain suspended two weeks; letter of reprimand.
26-June-05	BRIX	Vegetable base clarity oil	Couple of cups	Tug America near Foss Linnton dock – Mechanical error, leaking seal on port thruster unit	Not noted.

NOTES

- 1. All Product Quantity listed is assumed to be released into the water unless otherwise noted.
- 2. Information for this table is from five (5) sources:

**SPA** = Supplemental Preliminary Assessment Summary Report, Anchor Environmental, L.L.C. with Hahn and Associates, Inc., October 2000. See BRIX000748-001028.

**PHWP** = Portland Harbor RI/FS Programmatic Work Plan, Appendix E: Chemical Sources and Spill Records. Integral Consulting, Inc., 2004. See BRIXINHOUSE004464-004568.

**NRC** = National Response Center, Database Query <http://www.nrc.uscg.mil/foia.html>. 2008. See attached BRIXINHOUSE004799-004859; BRIXINHOUSE004462-004463.

**BMC** = Stock and Asset Purchase Agreement, Schedule 2.1.22(i), “Brix Maritime Company Tug Fuel Spills 03/15/90—07/29/93,” August 1993. See 00036061-6245.

**Supplemental Table 22-1 – Reported Spills/Releases**  
**9030 NW St. Helens Road, Portland, Oregon**

**BRIX** = Brix Source Documents. See 00015150 – 53; 00015157-58; 00015164-65; BRIXINHOUSE004485; BRIXINHOUSE004527; 10001170-71; 00036159; 00015218; 10000203-04; BRIXINHOUSE004460-61; 00014473; 00014494; 00014495; 00014497-98; 00014504-05; and 00015219.

- 3. Supplemental Table 22-1 is a compilation of observed spills for which there is some affirmative indication that (1) the spills occurred in the Investigation Area, and (2) the spills were somehow associated with (if not attributable to) the Property or Brix activities. Many of the spills summarized in Supplemental Table 22-1 were of small quantities of product, typically less than five gallons. Of the spills listed, several were releases that EPA ascribed to Brix activities, even though written records do not identify the source of those releases. To the best of its knowledge, Brix does not believe that there is any affirmative indication that this subset of spills can be attributed to the Property or Brix activities.
- 4. As noted above, Supplemental Table 22-1 incorporates data from multiple information sources. The accuracy of Supplemental Table 22-1, therefore, is limited by the reliability of the source information. Where more than one source existed for a particular spill, Brix used best efforts to reconcile any inconsistencies associated with the source information.

